

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BARBARA HAYWOOD,

Plaintiff,

v

UNKNOWN HOUGH, ET AL,

Defendants.

HON. ROBERT J. JONKER
U.S. DISTRICT COURT JUDGE

FILE NO. 1:17-cv-508-RJJ-ESC

Barbara Haywood, *Pro Per*
723 E. Lansing, Apt. 587B
Idlewild, MI 49642
(231) 660-6060

Adam P. Sadowski (P73864)
Brandon W. Waddell (P81494)
Assistant Attorney General
Attorneys for Def. HUBBARD
Civil Litigation, Employment &
Elections Division
525 W. Ottawa Street
P.O. Box 30736
Lansing, MI 48909
(517) 373-6434/(517) 241-2741 Fax
sadowskia@michigan.gov
waddellb@michigan.gov

G. Gus Morris (P32960)
Christopher J. Raiti (P68600)
MCGRAW MORRIS, P.C.
Attorneys for Def. EAGLE
2075 W. Big Beaver Road, Ste. 750
Troy, MI 48084-3433
(248) 502-4000/(248) 502-4001 Fax
gmorris@mcgrawmorris.com
craiti@mcgrawmorris.com

Gregory R. Grant (P68808)
CUMMINGS, McCLOREY, DAVIS &
ACHO, P.L.C.
Attorneys for Def. HOUGH
310 W. Front Street, Ste. 221
Traverse City, MI 49684
(231) 922-1888/(231) 922-9888 Fax
ggrant@cnda-law.com

**DEFENDANT HOUGH'S RESPONSE IN OPPOSITION TO PLAINTIFF'S
SECOND REQUEST FOR ENLARGEMENT OF TIME TO RESPOND**

NOW COMES Defendant HOUGH, by and through his attorneys, CUMMINGS, McCLOREY, DAVIS & ACHO, P.L.C., and for his Response in Opposition to Plaintiff's Second Request for Enlargement of Time to Respond, states as follows:

Plaintiff has filed the instant Request asking, for a second time, for additional time to

respond to Defendants' Motions for Summary Judgment. Plaintiff has had more than sufficient time to file a response, such that Defendant objects to this current request.

Defendant Hough filed his Motion for Summary Judgment on November 21, 2018. Doc. # 130. As of the date of this filing, Plaintiff has had a total of 81 days to file a response to the motion. Moreover, it is believed that Plaintiff is not actually preparing the motion responses herself. In fact, she has been utilizing the assistance of inmate and layman, Walter Jones.

Plaintiff has delayed this matter long enough. To that end, Defendant Hough respectfully requests that this Honorable Court deny her current Request for Enlargement of Time.

Dated: February 12, 2019

CUMMINGS, McCLOREY, DAVIS
& ACHO, P.L.C.

/s/ Gregory R. Grant
Gregory R. Grant (P68808)
Attorneys for Def. HOUGH
310 W. Front Street, Ste. 221
Traverse City, MI 49684
(231) 922-1888/(231) 922-9888 Fax
ggrant@cmda-law.com

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

BARBARA HAYWOOD,

Plaintiff,

v

UNKNOWN HOUGH, ET AL,

Defendants.

HON. ROBERT J. JONKER
U.S. DISTRICT COURT JUDGE

FILE NO. 1:17-cv-508-RJJ-ESC

Barbara Haywood, *Pro Per*
723 E. Lansing, Apt. 587B
Idlewild, MI 49642
(231) 660-6060

Adam P. Sadowski (P73864)
Brandon W. Waddell (P81494)
Assistant Attorney General
Attorneys for Def. HUBBARD
Civil Litigation, Employment &
Elections Division
525 W. Ottawa Street
P.O. Box 30736
Lansing, MI 48909
(517) 373-6434/(517) 241-2741 Fax
sadowskia@michigan.gov
waddellb@michigan.gov

G. Gus Morris (P32960)
Christopher J. Raiti (P68600)
MCGRAW MORRIS, P.C.
Attorneys for Def. EAGLE
2075 W. Big Beaver Road, Ste. 750
Troy, MI 48084-3433
(248) 502-4000/(248) 502-4001 Fax
gmorris@mcgrawmorris.com
craiti@mcgrawmorris.com

Gregory R. Grant (P68808)
CUMMINGS, McCLOREY, DAVIS &
ACHO, P.L.C.
Attorneys for Def. HOUGH
310 W. Front Street, Ste. 221
Traverse City, MI 49684
(231) 922-1888/(231) 922-9888 Fax
ggrant@cnda-law.com

PROOF OF SERVICE

STATE OF MICHIGAN)
) ss.
COUNTY OF GRAND TRAVERSE)

Laurie Robbins, being duly sworn, deposes and says that she served **DEFENDANT HOUGH'S RESPONSE IN OPPOSITION TO PLAINTIFF'S SECOND REQUEST FOR ENLARGEMENT OF TIME TO RESPOND and PROOF OF SERVICE**, by depositing the same in a U.S. mail receptacle in Traverse City, Michigan, on **February 12, 2019**, in a sealed envelope, postage fully prepaid thereon, plainly addressed to the following at said address(es):

VIA FIRST CLASS MAIL TO:

Barbara Haywood, *Pro Per*
723 E. Lansing, Apt. 587B
Idlewild, MI 49642

VIA ECF FILING TO:

Adam P. Sadowski
Brandon W. Waddell
Assistant Attorney General
Civil Litigation, Employment &
Elections Division

G. Gus Morris
Christopher J. Raiti
MCGRAW MORRIS, P.C.

Clerk of the Court
WESTERN DISTRICT OF MICHIGAN

A handwritten signature in blue ink that reads "Laurie Robbins". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

Laurie Robbins